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[Additional Counsel of Record listed on the next page]

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

KELLY CAHILL, et al., individually and on behalf of others similarly situated,

Plaintiffs.

VS.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-JR

PLAINTIFFS' UNOPPOSED MOTION TO UNSEAL PLAINTIFFS' MOTION TO RULE AS INADMISSIBLE PART OF THE EXPERT REPORT OF CHESTER HANVEY, Ph.D.

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## L.R. 7-1(a) Certification

In compliance with Local Rule 7-1(a), Plaintiffs certify that they have conferred on this Motion to Unseal with Defendant Nike, Inc.'s counsel regarding the substance of this Motion.

Nike does not oppose this Motion.

#### **MOTION TO UNSEAL**

Plaintiffs hereby submit this Motion to Unseal. On April 1, 2022, Plaintiffs filed their Motion to Rule as Inadmissible Part of the Expert Report of Chester Hanvey, Ph.D ("Motion") and supporting declaration under seal pursuant to the Parties' Protective Order because documents and information included in the Motion and declaration exhibits were stamped Confidential by Nike under the Protective Order. *See* ECF Nos. 192, 193. Plaintiffs met and conferred with Nike on unsealing the Motion, and Nike stated it has no objection to unsealing Plaintiffs' Motion and supporting declaration. As such, Plaintiffs respectfully request that the Court unseal Plaintiffs' Motion and supporting declaration.

Dated: April 12, 2022 Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

#### /s/ James Kan

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